

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF KEVIN GANNON
IN SUPPORT OF PLAINTIFF’S MOTION TO EXCLUDE
CERTAIN TESTIMONY OF LAURA B. STAMM AND DR. MARTIN WALKER
REGARDING REASONABLE ROYALTY**

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC (“Singular”), in this action. I submit this third declaration in support of Singular’s motion to exclude certain testimony of Laura B. Stamm and Dr. Martin Walker regarding reasonable royalty.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the Rebuttal Expert Report of Laura B. Stamm dated March 3, 2023.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from Singular’s Third Set of Interrogatories [Nos. 12-20] to defendant in this case.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from Defendant’s Response and Objection to Plaintiff’s Third Set of Interrogatories (No. 12-20).

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from Defendant’s Supplemental Responses and Objections to Plaintiff’s Third Set of Interrogatories (No. 12-20).

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from Defendant's Second Supplemental Responses and Objections to Plaintiff's Third Set of Interrogatories (No. 12-20).

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from Defendant's Third Supplemental Responses and Objections to Plaintiff's Third Set of Interrogatories (No. 12-20).

8. Attached hereto as Exhibit G is a true and correct copy of excerpts from Defendant's Fourth Supplemental Responses and Objections to Plaintiff's Third Set of Interrogatories (No. 12-20).

9. Attached hereto as Exhibit H is a true and correct copy of excerpts from Defendant's Fifth Supplemental Responses and Objections to Plaintiff's Third Set of Interrogatories (No. 12-20).

10. Attached hereto as Exhibit I is a true and correct copy of excerpts from Defendant's Sixth Supplemental Responses and Objections to Plaintiff's Third Set of Interrogatories (No. 12-20).

11. Attached hereto as Exhibit J is a true and correct copy of excerpts from Singular's Notice of Deposition of Google LLC Pursuant to Fed. R. Civ. P. 30(b)(6) dated May 5, 2021.

12. Attached hereto as Exhibit K is a true and correct copy of excerpts from the transcript of the deposition of Nishant Patil, Ph.D., taken in this case on July 16, 2021.

13. Attached hereto as Exhibit L is a true and correct copy of excerpts from the transcript of the deposition of Laura Stamm, taken in this case on March 30, 2023.

14. Attached hereto as Exhibit M is a true and correct copy of excerpts from the transcript of the deposition of Martin Walker, Ph.D., taken in this case on March 31, 2023.

Executed at Boston, Massachusetts on April 28, 2023.

/s/ Kevin Gannon
